

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) RANDY BLAKE PATTERSON,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-15-1204-HE
)	
(1) NATIONAL BOARD OF)	<i>(Formerly District Court of Oklahoma</i>
MEDICAL EXAMINERS,)	<i>County Case No. CJ-2015-5283)</i>
)	
Defendant.)	

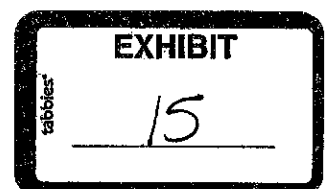
**PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF
INTERROGATORIES**

TO: Jack S. Dawson, OBA #2235
MILLER DOLLARHIDE
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Oklahoma City, Oklahoma 73102
(405) 235-8130 fax
jdawson@millerdollarhide.com
Attorneys for Defendant

COMES NOW the Plaintiff, Randy Blake Patterson, and for his answers to Defendant's First Set of Interrogatories, states:

GENERAL OBJECTIONS

Plaintiff objects to any of Defendant's discovery requests which call for information which is privileged from disclosure as confidential, proprietary, personal, or financial information, or which comes within the attorney/client or attorney work product privilege, or which was prepared in anticipation of litigation, and is therefore not subject to discovery under the Federal Rules of Civil Procedure.



facts, events, circumstances, conditions, occurrences, claims and/or defenses alleged in this litigation, including the name and address of each person from whom such statement was obtained; the date, place and by whom such report, statement, memorandum or testimony was obtained or made; and where each is located and in whose possession.

ANSWER: Not applicable.

INTERROGATORY NO. 9: What damages or injury do you claim to have suffered as a result of anything Defendant did or did not do?

ANSWER: Due to the failure of Defendant to meet its obligations outlined in the 2013 Bulletin Information and reasonably respond to the circumstances of the test in Los Angeles, California, Plaintiff was denied entry into residency training.

INTERROGATORY NO. 10: What is the amount of damage claimed by you and how did you calculate that amount?

ANSWER: \$2.5 million which is six years of average salary of general surgeons according to Medscape, plus interest from student loans which continued for six more years.

Respectfully Submitted,



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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of February 2016, a true and correct copy of the above and foregoing instrument was delivered via facsimile, email and/or U.S. mail, postage prepaid thereon, to:

Jack S. Dawson, OBA #2235
MILLER DOLLARHIDE
210 Park Avenue, Suite 2550
Oklahoma City, Oklahoma 73102
(405) 235-8130 fax
jdawson@millerdollarhide.com
Attorneys for Defendant



VERIFICATION

STATE OF OKLAHOMA)
) ss.
COUNTY OF OKLAHOMA)

I, Randy Blake Patterson, of lawful age, being first duly sworn, hereby certify that I have read the foregoing instrument and that the statements contained therein are true and correct.

R. Blake Patterson
RANDY BLAKE PATTERSON

Subscribed and sworn to before me this 16 day of February, 2016.

Rona Spaulding
NOTARY PUBLIC

My Commission Expires:
[SEAL]

